

# Examination of the Tunbridge Wells Borough Local Plan

## **Tunbridge Wells Borough Council Note Requested by the Inspector**

**Local Plan Examination Note for  
Inspector in response to Action Points 27  
and 29 regarding written statements from  
KCC Highways on Policy AL/RTW 19  
Land to the north of Hawkenbury  
Recreation Ground, Royal Tunbridge  
Wells and Policy AL/HA 8 Site at Limes  
Grove (March's Field), Hawkhurst**

**Document Reference: TWLP/150**

Date: September 2024



# Contents

1.0	Introduction .....	3
2.0	Action Point 27 – written statement from KCC Highways on Policy AL/RTW 19 - Land to the north of Hawkenbury Recreation Ground.....	3
3.0	Action Point 29 – written statement from KCC Highways on Policy AL/HA 8 - Site at Limes Grove (March's Field) .....	5
	Appendix 1 – KCC Highways statement on Policy AL/RTW 19 - Land to the north of Hawkenbury Recreation Ground.....	8
	Appendix 2 – KCC Highways statement on Policy AL/HA 8 - Site at Limes Grove (March's Field) .....	9

# 1.0 Introduction

- 1.1 During the Stage 3 Hearing Sessions on the Tunbridge Wells Borough Local Plan, the Inspector asked the Council to prepare a number of notes on 'Action Points', essentially to clarify certain matters that were discussed. This note relates to Action Points 27 and 29 both of which relate to the position of KCC Highways on two site allocations within the SLP. Written statements were requested and received from KCC Highways on the two site allocations.
- 1.2 The first site allocation in question is Policy AL/RTW 19 Land to the north of Hawkenbury Recreation Ground, Royal Tunbridge Wells which forms Action Point 27 discussed in section 2 of this document. The second site allocation is Policy AL/HA 8 – Site at Limes Grove (March's Field), Hawkhurst which forms Action Point 29 discussed in section 3 of this document.

## 2.0 Action Point 27 – written statement from KCC Highways on Policy AL/RTW 19 - Land to the north of Hawkenbury Recreation Ground

- 2.1 Matter 2: The Strategy for Royal Tunbridge Wells and Southborough, Issue 3: Hawkenbury Recreation Ground, Royal Tunbridge Wells – Policy AL/RTW 19 of the hearing programme was discussed as part of the [18 June 2024 hearing session](#). The discussion covered the access and parking aspects of the proposals for the site.
- 2.2 This was largely in relation to the information provided on access and road widening, and parking requirements through the earlier Stage 2 document TWLP/092 (Action Point 13: [part 1](#), [part 2](#), [part 3](#)) following the hearing session on 21 June 2022. The Council's [Hearing Statement TWLP/121](#) discusses this information in response to the

Inspector's question 'Does the additional information in Examination Document TWLP\_092 demonstrate that a safe and suitable access can be achieved for all users and that sufficient on and off-site car parking can be provided to serve the development?'

- 2.3 As part of the discussion at the Stage 3, 18 June 2024 hearing session, the Inspector noted it would be helpful for KCC Highways to confirm that the land use, type and scale of the overall development was considered when assessing the suitability for the road width. Accordingly, the Inspector asked for a written statement to confirm this along with whether KCC Highways is satisfied the impact on the local highway network can be mitigated and with the amended policy as set out in the Council's [Hearing Statement TWLP/121](#).
- 2.4 In response to this request, comments were received from KCC Highways in July and September 2024. These are included at **Appendix 1** of this Action Note.
- 2.5 To summarise, the comments demonstrate KCC Highways is satisfied with the policy as amended in the Council's [Hearing Statement TWLP/121](#) and that KCC Highways have considered the land use, type and scale of the overall development when considering the suitability for the road width. An amended plan has been provided and agreed with KCC, to demonstrate that the appropriate width can be achieved to access the site (6.2m rather than the 6m previously provided within Action Point 13: [part 1](#), [part 2](#), [part 3](#)). The comments from KCC also note information which would be required to support a planning application, all of which are required by policy AL/RTW 19 as proposed to be amended as set out below.
- 2.6 Firstly, KCC Highways state the need for a full Transport Assessment, which is required by policy criterion 3 of AL/RTW 19. The transport assessment would be based on where Tunbridge Wells Football Club (TWFC) are in the football league pyramid at the time of the planning application to build the stadium. Therefore, suitable trigger points for requiring a new Transport Assessment, as noted in KCC Highways comments, would be decided through the development management process at this stage.

- 2.7 Additionally, the need for a Travel Plan and a Traffic/Event and Parking Management Plan is noted. The amended policy AL/RTW 19 requires these through criterion 4 along with the requirement to promote sustainable modes of transport.
- 2.8 As such it is considered that the site allocation policy as amended is appropriate for this plan-making stage and KCC Highways have confirmed that they are content with this approach.

## **3.0 Action Point 29 – written statement from KCC Highways on Policy AL/HA 8 - Site at Limes Grove (March's Field)**

- 3.1 Policy AL/HA 8 is proposed to be deleted from the Local Plan through the revised development strategy set out in the Local Plan Development Strategy Topic Paper Addendum [[PS 054](#)]. This is in response to the highways concerns raised by the Inspector in his Initial Findings Letter [[ID-012](#)]. Following receipt of the Initial Findings Letter, the Council engaged with KCC Highways and set out three options for development on the site for KCC Highways to consider and advise on.
- 3.2 These options along with the response and subsequent proposed changes to the Local Plan were discussed in the Council's [Hearing Statement TWLP/129](#). The response from KCC Highways is attached at appendix 2 of TWLP/129. In summary, KCC Highways stated intensification of the site would not be supported, and thus none of the three options would be supported as an allocation in the Local Plan. Therefore, the allocation was proposed to be deleted from the Local Plan.
- 3.3 This change was consulted on as part of the consultation on the Council's Response to the Inspector's Initial Findings. One of the representations received was from the agent promoting the site (representation PIFC\_116 Kember Loudon Williams obo Kent Woodware Ltd). The representation included the [consultation response form](#) along with

a [supporting technical note](#) on highways matters produced by ADL Traffic & Highways on behalf of the site promoter.

- 3.4 This proposed deletion of the allocation was discussed under Matter 5: The Strategy for Hawkhurst, Issue 2: March's Field, Limes Grove, Gill's Green – Policy AL/HA 8 as part of the [20 June 2024 hearing session](#). In light of the technical note submitted by the site promoter, the Inspector requested KCC Highways confirm its view on whether the site is either A) justified as an allocation, or B) it is not justified and the reasons why.
- 3.5 A response has been received from KCC Highways on 01 July 2024 and is included within **Appendix 2** of this Action Note.
- 3.6 In summary, KCC Highways state the technical note prepared by the agent promoting the site, does not resolve the highways concerns on intensification of the site, and therefore, KCC Highways continue to support the removal of the allocation from the Local Plan on highways grounds.

# Appendices

# Appendix 1 – KCC Highways statement on Policy AL/RTW 19 - Land to the north of Hawkenbury Recreation Ground

**From:** [David Joyner](#) [REDACTED]  
**To:** [Sharon Evans](#)  
**Subject:** Local Plan Policy AL/RTW19 - Hawkenbury Hub, Royal Tunbridge Wells  
**Date:** 05 September 2024 16:35:15

---

**CAUTION: This email originated from outside of the organisation. Do not click links or open attachments unless you recognize the sender and know the content is safe.**

Dear Sharon,

Policy AL/RTW 19 – Land to the north of Hawkenbury Recreation Ground as amended provides sufficient 'in principle' information for KCC Highways to have confidence that safe and suitable access can be achieved in respect of road widening within highway land as well as land within the ownership of TWBC in accordance with the Kent Design Guide and in the light of Stantec plan reference 332611481/300/001 revision P02 dated 20/08/24 showing a 6.2m width carriageway. I can confirm that KCC Highways have considered the land use, type and scale (i.e. up to a maximum 3,000 capacity stadium) of the overall development when considering the suitability of the access and road width. Parking provision will need to be provided at the minimum necessary in order to prioritise access by sustainable modes. A full Transport Assessment will be required to be submitted in support of a planning application identifying the detailed impact and mitigations required. Trigger points will be agreed linked to if/when TWFC progresses through the leagues which would require a new Transport Assessment. An exemplar Travel Plan will be required to support journeys by sustainable modes and a comprehensive Traffic/ Event and Parking Management Plan will be required to be in operation on event days.

Regards

David

David Joyner, Transport & Development Planning Manager – West Kent, Kent County Council Highways & Transportation, [REDACTED] (direct), 03000 418 181 (helpline)



# Appendix 2 – KCC Highways statement on Policy AL/HA 8 - Site at Limes Grove (March's Field)

---

**From:** Louise.Gordon [REDACTED]  
**Sent:** Monday, July 1, 2024 6:50 PM  
**To:** Sharon Evans [REDACTED]  
**Cc:** Ellen Gilbert [REDACTED] Carlos Hone [REDACTED]  
[REDACTED] David.Joyner [REDACTED] Claire.Weeks [REDACTED]  
**Subject:** FW: Tunbridge Wells Local Plan Stage 3 Hearings - Action Point for Inspector

**CAUTION: This email originated from outside of the organisation. Do not click links or open attachments unless you recognize the sender and know the content is safe.**

Dear Sharon

Thank you for your email of 25 June 2024 concerning the additional information received in respect of Policy AL/HA 8 – Land at Marches Field, Limes Grove, Hawkhurst. The Transport Note prepared by ADL Traffic & Highways ref 6079,21.02.24 has been reviewed and the following comments are provided:

KCC H&T were previously consulted on options for potential site allocations of Limes Grove and a response was provided dated 21 March 2023 which is attached.

The options considered at that time were as follows:

- Option 1** - The provision of parking for the occupiers of the adjacent Hawkhurst Station Business Park, to provide 55 – 93 spaces
- Option 2** - If the provision of 55 – 93 parking for the occupiers of the adjacent Hawkhurst Station Business Park is not supported by KCC Highways, is there a smaller scale of parking that would be supported? or:
- Option 3** - A small scale, less intrusive commercial use associated with the adjacent Hawkhurst Station Business Park, for example a B8 storage use.

Concern was expressed regarding the following

1. Visibility at the junction of Limes Grove with the A229 Cranbrook Road is substandard
2. The width of Limes Grove being insufficient for two cars to pass
3. No footway along Limes Grove
4. No footway link to the nearest bus stop along the A229 Cranbrook Road

KCC H&T concluded that:

*The intensification of use of Limes Grove and its junction with the A229 by both traffic and pedestrians would be detrimental to highway safety and therefore the Highway Authority would not support any of the three options put forward for the allocation of the site in the Local Plan. It is noted that the site was formerly used as a woodyard and I would question whether there is an extant use. If this is the case further consideration can be given bearing in mind the traffic generation associated with that extant use.*

The Transport Note (TN) prepared by ADL Traffic & Highways seeks to address the concerns raised by KCC H&T. Attachment 2 of the TN outlines proposed improvements to Limes Grove as follows:

- Widening of Limes Grove within the highway boundary to provide a 5.5m wide carriageway.
- Provision of a 1.5m wide footway linking the proposed development site with the existing and committed footway along the A229 Cranbrook Road.

The drawings do not provide a safety audit or detail such as the extent of vegetation, trees and hedgerows to be removed, however subject to this detail it is likely that a scheme can be delivered to address the concerns raised in points 2, 3 and 4 outlined above.

The concern relating to point 1 above remains, as the proposed site allocation would result in an intensification of traffic movements at the junction of Limes Grove with the A229 Cranbrook Road where visibility is substandard. The estimated traffic generation provided in the TN suggests that the proposed use would generate 142 two-way movements per day and it is worth noting that TWBC have confirmed in their Hearing Statement that there is no extant use on the site. No traffic surveys have been provided for Limes Grove but it is likely that the traffic levels along this rural lane are currently low. The traffic flows on the A229 Cranbrook Road have been surveyed and the results included in the TN. Paragraph 5.7 of the TN states that the survey recorded 'a total of 613 and 655 two-way vehicle movements on the A229 during the AM and PM network peak hours (0800-0900 and 1700-1800) respectively.' It is likely therefore that vehicles leaving Limes Grove to join the A229 have limited gaps to make their turn and the increased use of the junction, which is substandard in terms of visibility, would be detrimental to highway safety .

I can confirm that KCC H&T continue to support the removal of the allocation from the Plan.

Kind Regards

Louise Gordon | Principal Transportation & Development Planner | Kent County Council |  
Highways & Transportation | [www.kent.gov.uk](http://www.kent.gov.uk) |